

Defendant Sung Shin, by and through his undersigned counsel, states as follows:

2. Plaintiff's thirty-two page Complaint (98 pages with declarations and exhibits) and over-length thirty-seven page EMTRO have necessitated that Defendant prepare a longer than usual Motion to Dismiss.

3. Counsel for Plaintiff and Defendant have conferred and Plaintiff's counsel has no objection to the filing of this over size brief.

4. Pursuant to Local Rule 7.1, briefs in this Court are limited to fifteen (15) pages without prior leave of the Court. Defendant's brief is eighteen (18) pages.

5. This motion is made in good faith and not for purposes of delay or any other improper purpose.

WHEREFORE, Mr. Shin respectfully requests this Court grant his Motion for Leave to File Defendant's Motion to Dismiss for Lack of Personal Jurisdiction Pursuant to Fed. R. Civ. P.

12(B)(2), Or In the Alternative, Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404; and Request for Order Vacating Temporary Restraining Order in excess of fifteen (15) pages.

DATED: November 17, 2021

/s/ Jeffrey L. Taren

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